

**R E M A R K S**

Reconsideration of this application, as amended, is respectfully requested.

**THE CLAIMS**

Independent claims 1 and 17 have been amended to recite subject matter based on claims 3 and 19, respectively, and claims 2, 3, 18, and 19 have been canceled, without prejudice.

No new matter has been added, and it is respectfully requested that the amendments to the claims be approved and entered.

**THE PRIOR ART REJECTION**

Claims 1-6, 15, 17-20, 22, 35, and 37 were rejected under 35 USC 103 as being obvious in view of the combination of JP 2002-307755 ("Takabayashi et al") and US 2002/0163551 ("Bruch et al"). In addition, claims 1-4, 9, 11-13, 15, 17-20, 25, 27-29, 31, 33, and 34 were rejected under 35 USC 103 as being obvious in view of the combination of USP 6,877,850 ("Ishimoto") and Bruch et al. Still further, claims 7 and 23 were rejected under 35 USC 103 as being obvious in view of the combination of Takabayashi et al and US 2001/0015745 ("Onishi et al") and in view of the combination of Ishimoto et al and Onishi et al. And finally, claims 14 and 30 were rejected under 35 USC 103 as being

obvious in view of the combination of Ishimoto et al and US 2001/0017642 ("Shigemura"). These rejections, however, are respectfully traversed with respect to the claims as amended hereinabove.

According to the present invention as recited in independent claims 1 and 17, pixel data of the image data is divided into unit blocks, an adhered amount of the colorless ink for each unit block is determined, and a jetted position of the colorless ink in each unit block is determined preferentially as a position that is not adjacent to a jetted position of the recording ink in each unit block.

With the method and structure recited in amended independent claims 1 and 17, because the colorless ink can be arranged preferentially in a position that is not adjacent to the jetted position of the recording ink in each unit block, the colorless ink can be prevented from contacting the recording ink. As a result, it is possible to prevent bleeding of the recording ink and blurring of the recorded image.

In addition, with the method and structure recited in amended independent claims 1 and 17, because the adhered amount of the colorless ink is controlled per unit area, the image imprinted on the recording medium does not look uneven in terms of glossiness.

Re: "preferentially does not mean necessarily"

At the bottom of page 2 of the Office Action, and again in the middle of page 5 of the Office Action, the Examiner merely asserts with respect to claims 3 and 19 that "preferentially does not mean necessarily." The Examiner does not actually assert that any cited references discloses the subject matter of claims 3 and 19.

As the Examiner notes, "preferentially does not mean necessarily." But "preferentially" does mean "preferentially." That is, the Examiner appears to suggest that not caring whether or not colorless ink is positioned adjacent to recording ink is equivalent to the features previously recited in claims 3 and 19, because "preferentially does not mean necessarily." If this is the Examiner's position, it ignores the plain language of the claims.

According to claim 1, the method is performed such that "a jetted position of the colorless ink in each said unit block is determined preferentially as a position that is not adjacent to a jetted position of the recording ink in each said unit block" (emphasis added). Simply disregarding a positional relationship between the jetted positions of the colorless ink and recording ink is, naturally, not at all the same as preferentially determining the jetted position of the colorless ink in each unit

block as a position that is not adjacent to a jetted position of the recording ink in each said unit block, as recited in claim 1.

Thus, although the Examiner notes that "preferentially does not mean necessarily," this observation is insufficient to render obvious the feature of claim 3 now recited in claim 1. Instead, in order to render obvious the present invention as recited in claim 1, the prior art must suggest a method in which (among the other features of claim 1) a jetted position of the colorless ink in each unit block is determined preferentially as a position that is not adjacent to a jetted position of the recording ink in each unit block. The cited references, however, do not disclose or suggest this feature of claim 1.

In addition, it is respectfully pointed out that amended claim 17 similarly recites that "the control unit determines a jetted position of the colorless ink in each said unit block preferentially as a position that is not adjacent to a jetted position of the recording ink in each said unit block" (emphasis added). Thus, in order to render obvious claim 17, the prior art must suggest (among the other features of claim 1) a control device which preferentially determines a jetted position of the colorless ink in each unit block as a position that is not adjacent to a jetted position of the recording ink in each unit block. The cited references, however, do not disclose or suggest this feature of claim 17.

Re: Takabayashi et al, Ishimoto et al, and Bruch et al

Takabayashi et al discloses that colored ink 17 adheres to the front face of print media 16, and if the colored ink 17 has not adhered, transparent and colorless (N) ink 18 adheres to a part with little coating weight instead. As a result, the coating weight of the ink in the front face of print media 16 becomes close to homogenous, and a difference of the rate of a light reflex (i.e., gloss nonuniformity) is reduced. See paragraph [0053] of Takabayashi et al.

In addition, Takabayashi et al discloses that the half toning section 13 also generates N dot data in which the dot of transparent and colorless (N) ink was shown, when generating the bit map image data 14. According to the N dot data, when the dot of the colored ink of either C, M or Y is not applied, it will replace the dot of that colored ink that is not applied, and the dot of N ink will be applied. Or according to the N dot data, N ink is made to adhere so that the hole of that colored ink may be filled to a bright field with little coating weight of colored ink. See paragraph [0050] of Takabayashi et al.

Thus, Takabayashi et al merely discloses that the colorless ink adheres to a portion to which the colored ink does not adhere. And it is respectfully submitted that Takabayashi et al does not disclose or suggest the features of claims 1 and 17

whereby a jetted position of the colorless ink in each unit block is determined preferentially as a position that is not adjacent to the jetted position of the recording ink in each unit block.

Ishimoto et al discloses that the discharge amount of the pigment ink composition and the discharge amount of the clear ink composition are adjusted so that the total amount of resin component per unit of surface area will be substantially uniform over the entire recording surface of the resin medium. It is respectfully submitted, however, that Ishimoto et al does not disclose or suggest the features of claims 1 and 17 whereby a jetted position of the colorless ink in each unit block is determined preferentially as a position that is not adjacent to the jetted position of the recording ink in each unit block.

Bruch et al, moreover, has been cited merely as disclosing that the recording of an image is carried out in a 1mm square unit. However, Bruch et al also does not disclose or suggest the features of claims 1 and 17 whereby a jetted position of the colorless ink in each unit block is determined preferentially as a position that is not adjacent to the jetted position of the recording ink in each unit block.

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In view of the foregoing, it is respectfully submitted that amended independent claims 1 and 17, and all of the claims

respectively depending therefrom, clearly patentably distinguish over Takabayashi et al, Ishimoto et al, Bruch et al, Onishi et al, and Saito, taken singly or in any combination consistent with the respective fair teachings thereof, under 35 USC 103.

Entry of this Amendment, allowance of the claims and the passing of this application to issue are respectfully solicited.

If the Examiner has any comments, questions, objections or recommendations, the Examiner is invited to telephone the undersigned at the telephone number given below for prompt action.

Respectfully submitted,

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